

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

-v.- :

CERTAIN FUNDS ON DEPOSIT IN :

VARIOUS ACCOUNTS DETAILED HEREIN, :

AND ALL FUNDS TRACEABLE THERETO, :

:

Defendants-*in-rem*.

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**POST-COMPLAINT
RESTRAINING ORDER
PURSUANT TO
18 U.S.C. § 983(j)(1)**

20 Civ. 3397 (LJL)

WHEREAS, on May 1, 2020, the United States commenced this action, upon the filing of a verified complaint (the "Complaint"), seeking forfeiture of the funds on deposit in the following five bank accounts in Singapore and all funds traceable thereto (the "Defendant Funds"):

- a. Any and all funds including but not limited to \$2,230 USD on deposit in account number 503245425301 in the name of MMT International Holdings Ltd. at Oversea-Chinese Banking Corporation in Singapore, and all funds traceable thereto (Subject Account-1);
- b. Any and all funds including but not limited to \$708,570 USD on deposit in account number 503609240401 in the name of MMT International Holdings Ltd. at Oversea-Chinese Banking Corporation in Singapore, and all funds traceable thereto (Subject Account-2);
- c. Any and all funds including but not limited to 432,377 CNH on deposit in account number 0003-0216417-01-0 in the name of MMT International Holdings Ltd. at DBS Bank in Singapore, and all funds traceable thereto (Subject Account-3);

d. Any and all funds including but not limited to 5,523,412 CNH on deposit in account number 0003-009818-1 in the name of MMT International Holdings Ltd. at DBS Bank in Singapore, and all funds traceable thereto (Subject Account-4); and

e. Any and all funds including but not limited to 8,011,574 HKD on deposit in account number 0003-021646-01-9 in the name of MMT International Holdings Ltd. at DBS Bank in Singapore, and all funds traceable thereto (Subject Account-5);

(a. through e. collectively, the "Subject Accounts");

WHEREAS, the Complaint alleges that from in or about 2001 through at least in or about January 2019, in the Southern District of New York and elsewhere, Wayne Franklyn Chinn, a/k/a "Frank Chinn" ("Chinn") willfully and knowingly engaged in a scheme to defraud the United States of America of a substantial part of the income taxes due and owing by Chinn for the calendar years 2001 through 2018 and to launder the proceeds of the fraudulent scheme;

WHEREAS, the Complaint alleges that the Defendant Funds (i) constitute proceeds of Chinn's scheme to defraud the United States of substantial income taxes through the use of interstate and foreign wires, and are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C); and (ii) are property involved in money laundering, and are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A);

WHEREAS, the Court finds that there is probable cause to believe that the Defendant Funds are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 981(a)(1)(A); and

WHEREAS, the United States has applied for a restraining order to secure, maintain, and preserve the availability of the Defendant Funds for civil forfeiture;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, PURSUANT TO 18 U.S.C. § 983(j)(1)(A), THAT:

1. All persons or entities having actual knowledge of this Order shall not, directly or indirectly, transfer, sell, assign, pledge, hypothecate, encumber, or dispose of in any manner; cause to be transferred, sold, assigned, pledged, hypothecated, encumbered, disposed of in any manner; or take, or cause to be taken, any action that would have the effect of depreciating, damaging, or in any way diminishing the value of the Defendant Funds;


IT IS FURTHER ORDERED that the United States Attorney's Office for the Southern District of New York and the United States Department of Justice, Tax Division, in their discretion, are authorized to direct the release of assets restrained herein;

IT IS FURTHER ORDERED any person or entity claiming an interest in the assets listed in this Order may contact the

following prosecutors to clarify the scope of the Order: (1) Assistant United States Attorney Olga Zverovich, Telephone Number (212) 637-2514, Email Address olga.zverovich@usdoj.gov, (2) Special Assistant United States Attorney Nanette Davis, Telephone Number (202) 514-8030, Email Address nanette.l.davis@usdoj.gov, or (3) Special Assistant United States Attorney Sean Green, Telephone Number (202) 307-2554, Email Address sean.m.green@usdoj.gov. Those persons or entities will not be deemed in violation of this Order for any transactions undertaken upon approval made in writing by the above-listed prosecutors; and

IT IS FURTHER ORDERED that this Order shall remain in effect until further order of this Court.

SO ORDERED:



HONORABLE LEWIS J. LIMAN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

5/7/2020

DATE